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August 17, 2021

VIA ELECTRONIC FILING

Honorable Lorna G. Schofield United States District Court Southern District of New York 500 Pearl Street New York, New York 10007 Application granted. The document at Dkt. No. 79 shall be sealed for substantially the reasons the parties provide in their joint letter motion.

Dated: August 17, 2021 New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

RE: Kewazinga Corp. v. Google LLC, Case No. 1:20-cv-1106-LGS (S.D.N.Y.)
Joint Request Regarding Sealing of Dkt. No. 79

Dear Honorable Judge Schofield:

The parties submit this joint letter motion regarding the sealing of Dkt. No. 79.

On August 17, 2021, the Court entered an Order (Dkt. No. 137) granting the parties' Joint Motion to Seal (Dkt. Nos. 106, 107) certain portions of the papers associated with the parties' cross motions for summary judgment.

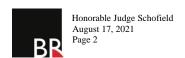
In the motion, the Court found that the Joint Motion to Seal did not address Dkt. No. 79 and therefore ordered that the temporary seal on it be lifted.¹

Dkt. No. 79, however, was previously ordered stricken from the record by the Court, *see* Dkt. No. 92 (ordering, "The Clerk of the Court is respectfully requested to strike the filings at Dkt. Nos. 78, 79, 81, 82, 83, and 85"), August 4, 2020 ECF entry ("***STRICKEN DOCUMENT. Deleted document [78, 79, 81, 82, 83 and 85] from the case record. The document was stricken from this case pursuant to [92] Memo Endorsement."), which is the reason why it was not addressed in the Joint Motion to Seal.

Accordingly, the parties respectfully request that the Court order that Dkt. No. 79 be removed from the record pursuant to its order striking it and/or keep the document under seal so that its contents do not become publicly accessible. Should the Court desire an additional briefing and/or motion, the parties respectfully request the opportunity to provide such briefing and that the document be kept under seal until the Court can consider the parties' arguments.²

¹ The Court made the same finding with respect to Dkt. No. 85. Dkt. No. 85, however, is the public version of Dkt. No. 79 and does not contain any material that the parties contend needs to be sealed and is therefore not the subject of this letter.

² The parties note that Dkt. No. 79 is substantially similar to Dkt. No. 93, which was addressed in the Joint Motion to Seal and which the Court ordered should remain sealed. *See* Dkt. No. 137.



Dated: August 17, 2021

/s/ Ian G. DiBernardo

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